

Adam Wolek (*pro hac vice*)  
Taft Stettinius & Hollister LLP  
111 E. Wacker Drive, Suite 2800  
Chicago, Illinois 60601-3713  
Tel: 312.836.4063  
Fax: 312.966.8598  
awolek@taftlaw.com

DAVID A. MAKMAN (SBN 178195)  
[david@makmanlaw.com](mailto:david@makmanlaw.com)  
LAW OFFICES OF DAVID A. MAKMAN  
655 Mariner's Island Blvd, Suite 306  
San Mateo, CA 94404  
Telephone: (650) 242-1560  
Facsimile: (408) 716-3052

Attorneys for Plaintiffs  
Parkridge and Mabel Mak

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

On Behalf of PARKRIDGE LIMITED, a Hong  
Kong corporation, by Mabel Mak, and MABEL  
MAK, an individual,

Plaintiffs,

v.

INDYZEN, INC., a California corporation, and  
PRAVEEN NARRA KUMAR, an individual,  
Defendants.

**Case No. 16-cv-07387-KAW**

**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO DEFENDANTS' MOTION  
TO COMPEL ARBITRATION OF FIVE  
NEWLY-NAMED PARTIES UNTIL  
AFTER THE HOLIDAYS**

Date: December 19, 2017  
Time: N/A  
Dept.: N/A  
Judge: Hon. Kandis A. Westmore

Plaintiffs Parkridge *et al.* respectfully request the Court extend the deadline to respond to  
Defendants Motion to Compel Arbitration of Five Newly-Named Parties until at least January 18,

1 2018.<sup>1</sup> Defendants' filing was made as a motion to compel (Dkt. 32), originally triggering an  
2 electronically-set response date of December 28, 2017. Plaintiffs' counsel requested an extension  
3 from Defendants' counsel because that briefing schedule would require counsel to work over  
4 Christmas, among other reasons. *See* Exhibit A. Defendants' counsel agreed to a response date of  
5 at least January 4, 2018. *See id.* However, that due date would still interfere with the upcoming  
6 holidays and Plaintiffs' counsels' travel for the holidays because a Response being due *right after*  
7 the holidays would effectively require counsel to work *over* the holidays. Plaintiffs' counsel  
8 requested additional time to avoid interfering with the holidays, among other reasons. *See id.*

9  
10 Furthermore, more than two weeks is needed to address all of the complex issues raised in  
11 Defendants' motion, including, among other issues, whether each of the five newly-named entities  
12 were signatories to an agreement premised on an alter-ego theory (each would have to undergo a  
13 separate alter-ego analysis), whether the Court properly has jurisdiction over *each* of the five newly-  
14 named entities, and whether *each* of the five newly-named entities Consents to Magistrate Judge  
15 Jurisdiction.  
16

17 Moreover, given that the five newly-named parties are *all located in* Asia, the time  
18 difference and logistical communication issues further exacerbate delays in getting information, and  
19 sign off, to respond and address each of the relevant issues.

20 For these, and other reasons, Plaintiffs' respectfully request the Court enter an order  
21 extending the deadline from January 4, 2018, to respond to at least January 18, 2018.  
22  
23  
24

---

25 <sup>1</sup> This request for an extension of time is made without prejudice to any defenses or arguments, and all rights  
26 are expressly reserved, including, but not limited to, challenging the propriety of the jurisdiction before this  
27 Court over the newly-named parties, the propriety of these disputes before this Court, the propriety of the  
28 process, the sufficiency of the allegations made, and the underlying facts and law, and reserve all rights  
hereto.

1 DATED: December 19, 2017

Respectfully submitted,

2 By: /s/ Adam Wolek  
Adam Wolek (*pro hac vice*)  
3 Taft Stettinius & Hollister LLP  
4 111 E. Wacker Drive, Suite 2800  
Chicago, Illinois 60601  
5 Tel: 312.836.4063  
Fax: 312.966.8598  
6 awolek@taftlaw.com

7 LAW OFFICES OF DAVID A. MAKMAN  
David A. Makman, SBN 178195  
8 david@makmanlaw.com

9 Attorneys for PLAINTIFFS

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on December 19, 2017, he caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to counsel of record for each party.

Dated: December 19, 2017

Taft Stettinius & Hollister LLP

By: /s/ Adam Wolek

Adam Wolek